



Re: Rodriguez v. Guevara - Answer/Otherwise Plead to 2nd Amended Complaint

----- Forwarded message -----

From: **Tara Thompson** <tara@loevy.com>

Date: Fri, May 15, 2020 at 5:48 PM

Subject: Re: Rodriguez v. Guevara - Answer/Otherwise Plead to 2nd Amended Complaint

To: Austin Rahe <arahe@rfclaw.com>, Kara Hutson <khutson@rfclaw.com>, Josh M. Engquist <JEngquist@jsotoslaw.com>, David A. Brueggen <DBueggen@jsotoslaw.com>, Theresa B. Carney <tcarney@rfclaw.com>, Catherine M. Barber <cbarber@rfclaw.com>, Kevin Zibolski <kevin@ilesq.com>, Michael J. Schalka <mjs@ilesq.com>, Jim Daffada <jim@ilesq.com>, tom@ilesq.com <tom@ilesq.com>, Jeffrey R. Kivetz <JKivetz@jsotoslaw.com>, Caroline P. Golden <cgolden@jsotoslaw.com>, Diamond M. Dixon <DDixon@jsotoslaw.com>, Justin Leinenweber <justin@ilesq.com>, Eileen E. Rosen <ERosen@rfclaw.com>

Cc: Russell <russell@loevy.com>, Rachel Brady <brady@loevy.com>

Counsel:

Following up on this letter and the discussion of FERPA issues contained therein, attached please find the FERPA releases signed by Plaintiff. We are not able to provide notarized copies but do not object to any subpoena for the specific records identified in these releases.

Best,

Tara



Rodriguez FERPA Releases.pdf
157K

RE: Rodriguez v. Guevara - FERPA Releases

Tara Thompson <tara@loevy.com>

Tue, May 19, 2020 at 8:03 PM

To: "David A. Brueggen" <DBueggen@jsotoslaw.com>

Cc: Austin Rahe <arahe@rfclaw.com>, Kara Hutson <khutson@rfclaw.com>, "Josh M. Engquist" <JEngquist@jsotoslaw.com>, "Theresa B. Carney" <tcarney@rfclaw.com>, "Catherine M. Barber" <cbarber@rfclaw.com>, Kevin Zibolski <kevin@ilesq.com>, "Michael J. Schalka" <mjs@ilesq.com>, Jim Daffada <jim@ilesq.com>, "tom@ilesq.com" <tom@ilesq.com>, "Jeffrey R. Kivetz" <JKivetz@jsotoslaw.com>, "Caroline P. Golden" <CGolden@jsotoslaw.com>, "Diamond M. Dixon" <DDixon@jsotoslaw.com>, Justin Leinenweber <justin@ilesq.com>, "Eileen E. Rosen" <ERosen@rfclaw.com>, Russell <russell@loevy.com>, Rachel Brady <brady@loevy.com>

David:

Thanks for catching that. Our client accidentally signed the same one twice. Here's the other one.

To follow up on the issues raised in your Rule 37 letter and in this email chain, Plaintiff has decided not to pursue his claims for lost wages - we will formalize that position in correspondence. That should obviate the need for discovery of his educational records.

Best,

Tara

[Quoted text hidden]



Rodriguez FERPA Waiver Universal Life Church.pdf

260K